

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

KENDALL RAYE ROGERS,

Plaintiff,

v.

STATE OF DELAWARE,
DEPARTMENT OF PUBLIC SAFETY/
DMV,

Defendants,

C. A. No. 05-721-KAJ


AFFIDAVIT OF MICHAEL SHAHAN

COMES NOW, MICHAEL SHAHAN, who deposes and says:

1. I am employed by the state of Delaware, Department of Transportation, Division of Motor Vehicles (DMV). My title Director, Division of Motor Vehicles. I have been employed in this capacity for 14 years.
2. As Director of the Division of Motor Vehicles, my duties include oversight of personnel matters within the DMV. Therefore I am familiar with the circumstances surrounding the transfer of Mr. Kendall Rogers from a position in the DMV Inspection Lanes to the Dover Driver's License Section, to the New Castle Driver's License Section, and back to the Dover Driver's License Section.
3. I contributed to the responses written in the foregoing Defendant's Response to Plaintiffs' Interrogatories Directed to Defendant.
4. My contributions to the responses are true and correct to the best of my knowledge.


Michael Shanahan

SWORN AND SUBSCRIBED before me this 21st day of September 2006.


Notary Public